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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 6, 2002

Mr. William F. Caton
(Acting) Secretary
Federal Communications Commission
445 Twelfth Street, S.W. Room TWB-204
Washington, DC 20544

Re: ET Docket 98-153, Revision of Part 15 of the Commission's Rules Regarding
Ultra-Wideband Transmission Systems, *Ex Parte* File

Dear Mr. Caton:

On September 12, 2000, Nortel Networks filed comments in the referenced proceeding. In those comments, Nortel Networks endorsed the concept of fostering the use of ultra-wideband (UWB) technology as a means of efficiently utilizing spectrum for communications needs as well as other innovative purposes. However, Nortel Networks also expressed concern that unlicensed use of ultra-wideband devices could potentially cause harmful interference to critical existing and proposed communications services and suggested that the Commission should not authorize UWB devices absent the most careful consideration.

Nortel Networks continues to believe that authorization of UWB devices without taking adequate account of potential interference would have serious negative consequences for the remainder of the communications industry, operators, and manufacturers. Nortel Networks makes the following points:

- Nortel Networks remains concerned about the introduction of UWB without suitable restrictions to prevent interference to other radio systems.
- Nortel Networks agrees with the submissions and analysis showing significant UWB in-band interference to radio communications systems including PCS. These analyses are consistent with our internal studies and those of other groups working internationally, e.g. the United Kingdom's Radio Communications Agency and the CEPT PT SE24 UWB study.
- Nortel Networks supports a 6 GHz lower limit for UWB emissions to protect the UNII service in the 5 GHz bands.
- Nortel Networks agrees with the January 28, 2002 letter to Chairman Powell filed by counsel for Sirius that the introduction of new systems under Part 15 must not cause interference to existing, compliant systems. Manufacturers and operators of

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equipment that would be impacted by UWB interference cannot be expected to finance the testing necessary to accommodate new in-band UWB users.

- The record of this proceeding suggests considerable evidence of harmful UWB interference. Moreover, because of the intermittent and / or noise-like nature of the operation of UWB devices, although interference will be detected, it will be difficult to identify specific interference sources.

In summary, Nortel Networks continues to urge the Commission to act with caution as it considers allowing this new technology and to take all necessary precautions to ensure that UWB is not introduced at the cost of harmful interference to current and future communications services.

Pursuant to section 1.1206(b)(1) of the Commission's rules two copies of this letter are being provided.

Sincerely,



Raymond L. Strassburger
Vice President, Global Government Relations,
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RLS/kc

cc: Monica Desai
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